

**CITY COUNCIL WORK SESSION
ON
TAXICAB REGULATIONS**

**TUESDAY, MARCH 23, 2004
5:30 p.m.**

CITY COUNCIL WORK ROOM

AGENDA

- I. INTRODUCTION**
- II. GOALS OF WORK SESSION**
- III. MAJOR CHARACTERISTICS OF CURRENT TAXI INDUSTRY IN ALEXANDRIA** **BRUCE SCHALLER
(City Consultant)**
- IV. POTENTIAL MODIFICATIONS TO TAXI REGULATIONS**
 - A. ALTERNATIVE MODELS** **BRUCE SCHALLER**
 - B. AUTO PROPOSAL** **AUTO**
(Alexandria United Taxi-drivers Organization)
 - C. TAXICAB COMPANIES' PERSPECTIVES** **TWO
REPRESENTATIVES
FROM TAXICAB
COMPANIES**
- V. COUNCIL DISCUSSION**
- VI. FUTURE STEPS**

Individuals with disabilities who require assistance or special arrangements to participate in the City Council meeting may call the City Clerk and Clerk of Council's Office at 703-838-4500 (TTY/TTD 703-838-5056). We request that you provide a 48-hour notice so that the proper arrangements may be made.

Information for Council Work Session on Alexandria Taxicab Issues

Submitted to:
City of Alexandria
Transportation & Environmental Services

March 23, 2004

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Purpose

This document reflects our initial review of Alexandria taxicab issues, based on interviews with City staff, drivers and cab company owners conducted in December 2003. Since this document is an interim work product, the information presented below should be viewed as subject to further revision based on feedback from City and taxi industry personnel, additional data collection and analysis. We would appreciate comment and feedback from all interested parties and will be structuring the opportunity for this feedback and discussion.

Overall goals for the taxi industry and City

- Responsive and reliable taxicab service, courteous and knowledgeable drivers and clean and well-maintained vehicles.
- Equitable, respectful and professional relationship between drivers and cab companies.
- Opportunity for drivers and cab companies to thrive economically.
- Opportunity for new companies to enter the industry and compete with existing companies.
- Flexible regulatory system that is adaptable to changing circumstances.
- Economical regulatory apparatus that can effectively carry out its mission.

Principles

- Customer service is the number one priority for the cab industry and the community it serves. Service to the customer is the basis for a healthy industry that can achieve all other goals.
- Central to customer service is prompt and reliable response to telephone calls for service. Fostering effective dispatch operations is thus a central purpose of any regulatory structure.
- Competition between cab companies is an important force in achieving quality taxicab dispatch service. Key elements of a competitive environment are the existence of multiple companies with effective dispatch operations; opportunity for new companies to enter the market; and opportunity for companies to set their number of cabs to match customer call volumes.
- Competition between cab companies is also an important force in achieving fair treatment of drivers. This means that drivers must have a meaningful opportunity to move between companies.

- The regulatory structure must meet the core needs of each constituent group – customers, drivers, cab companies and government – in a balanced and fair manner. While no group is likely to be completely satisfied with the structure, no group should feel disadvantaged relative to other groups.
- The process of developing an appropriate regulatory system needs to identify and address the interests of each constituent group. The process needs to allow for an open and forthright discussion of alternative regulatory structures and how each option affects each group's interests. Customers, cab company owners, drivers and government officials must engage in this process.
- The regulatory structure must also address the government costs associated with regulation, how those costs are funded, and the capability of government to effectively carry out the mission assigned to it.

Customer, industry and City interests

Alexandria's taxi passengers, taxi drivers and cab companies and the City itself have a wide range of interests and goals that are important to the taxicab regulatory structure. Some of these interests and goals are more critical to the choice of regulatory systems than are others, however. Based on interviews, the following interests and goals appear to be most critical in the discussion of regulatory options.

Taxi users

- Cabs reliably and quickly available by dispatch, at taxi stands and the airport
- Drivers courteous and knowledgeable of the city's geography
- Safe driving and safe vehicles
- Vehicles clean and in good condition
- Fare affordable and charged correctly

Taxi drivers

- Movement between cab companies in a competitive environment
- Respect and fair treatment by cab companies and City
- Fair stand dues – good level of service for the money paid
- Better dispatch operations (e.g., reliable phone system, knowledgeable call-takers and dispatchers, ability to talk with dispatchers when needed)
- Value in certificate card
- Not being limited to only serving the airport market
- More marketing of the business by the cab companies

- Vacations and sick leave without paying stand dues
- Non-Alexandria cabs not impermissibly serving Alexandria customers
- Have these issues addressed and a fair resolution implemented

Taxi companies

- Serve pre-arranged calls for service effectively – ability to guarantee service to customers
- Control over number of cabs in company, including keeping “slots” when drivers leave
- Ability to obtain additional cabs in order to expand
- Drivers taking dispatched calls
- Maximize gate fee income
- Discipline drivers when necessary
- Have issues with drivers resolved

City

- Quality of taxicab service
- Professional, respectful and productive relationships between cab companies and drivers.
- Compliance with licensing, insurance and other regulatory requirements
- Industry responsible for service quality
- City regulatory role and costs minimized
- Have issues raised by drivers resolved

Taxi industry and market profile

Taxicab certificates

Columbus	46
Diamond Cab	156
King Cab	57
VIP Cab	58
White Top Cab	116
Yellow	212
TOTAL	645

Pre-arranged call volumes (per day, a/o Dec. 2003)

Yellow	1,900
Diamond	700
White Top	300
King/VIP/Columbus	25
TOTAL	2,925

Estimated trip volumes (per day, a/o Dec. 2003)

Pre-arranged trips	2,600-2,800
City stands/flags	800-1,200
Airport	2,000
TOTAL	5,400-6,000

Estimated number of cabs focusing on each major market (a/o Dec. 2003)

Primarily or exclusively work City (non-airport) pick-ups	325 cabs
Primarily or exclusively work the airport	260 cabs
Mix of City/airport trips	35 cabs
TOTAL	620 cabs

(Note: counts exclude Diamond cabs not in use as of Dec. 2003)

Citizen complaints received by Hack Inspector

Calendar year	Complaints
1998	117
1999	153
2000	136
2001	125
2002	104
2003	97

Driver applications

Calendar

year	Applications
1998	510
1999	398
2000	392
2001	294
2002	381
2003	257

Driver licensing

# licensed drivers as of 12/31/03:	1,030
# licenses issued to new drivers 7/18/03 to 12/31/03:	35

Stand dues (weekly)

Yellow Cab	
Computerized dispatch, credit card processing	\$ 150
Diamond Cab	
Computerized dispatch, credit card processing	\$ 135
No dispatch, no credit card processing	\$ 60
White Top – voice dispatch	\$ 80-85
VIP Cab – voice dispatch (minimal # of calls)	\$ 70
Columbus Cab – voice dispatch (minimal # of calls)	\$ 60
King Cab – voice dispatch (minimal # of calls)	\$ 50

Note: stand dues quoted are for new drivers; stand dues paid by veteran drivers are often significantly lower.



Discussion of taxicab regulatory models

As in any city, Alexandria taxicab regulation directly impacts the size, composition and structure of the industry and quality of taxicab service. Central features of the regulatory system include the method of determining the number of cabs that may operate, qualifications for obtaining operating authorities, how drivers are licensed, the relationship between drivers and cab companies, and the fares charged. The challenge that cities face is to match regulatory features with service and industry needs.

The key features of Alexandria's **current** regulatory model are:

- This City issues a Certificate of Convenience and Necessity to each taxi company for the operation of cab service in the city. The Certificate states the number of cabs that may be operated under the Certificate.
- The City also issues certificate cards to taxi companies, one card per vehicle under the company's Certificate of Convenience and Necessity. Cab companies hold and control the certificate cards. (Although not formal elements of the current regulatory model, in practice vehicles are generally owned by drivers and often vehicles are sold with their certificate card at values that exceed the value of the vehicle itself.)
- The number of taxicabs is determined by the City Manager on an annual basis after a public hearing. Taxi companies that want additional certificate cards must establish that "public convenience and necessity" (PCN) "require" the operation of additional taxicabs. In practice, no additional certificates have been issued in over a decade.
- Each cab company must have a minimum of 10 operating taxicabs and must provide 24-hour radio dispatch service in the city.
- Regulations require that 51% per week of all trips per vehicle shall either originate or terminate in the City of Alexandria.
- The City sets a uniform fare that is charged by all cabs.
- The City of Alexandria Police Department focuses its regulatory resources on testing applicants for new taxi driver licenses and on vehicle inspections. T&ES focuses on issues related to the number of certificates and fares. Aside from these functions, regulatory requirements and enforcement are relatively minimal.

Also, taxi drivers may obtain a permit from Reagan National Airport to pick up on-demand customers at the airport. The role of airport service is a critical aspect of the Alexandria taxi industry but is not formally part of the city's regulatory model nor is it controlled by the City.

Three alternative regulatory models are presented on the following pages for the purpose of structuring discussion and comment on regulatory options. These alternatives are meant to be illustrative—they are not exhaustive of regulatory models that the City could adopt. Note that many of the components of one option could be used in other options.

Model A. Current system with modifications

Overview:

Maintains current structure for issuing Certificates of Convenience and Necessity and certificate cards. Provides incentive for cab companies to serve dispatch trips by requiring a minimum number of non-airport cabs in each company. Simplifies process for cab companies to expand as their call volumes increase.

Key features:

- This City issues a Certificate of Convenience and Necessity to each taxi company for the operation of cab service in the city. The Certificate states the number of cabs that may be operated under the Certificate. *(No change from current system.)*
- The City also issues certificate cards to taxi companies, one card per vehicle under the company's Certificate of Convenience and Necessity. Cab companies hold and control the certificate cards. *(No change from current system.)*
- The number of taxicabs is determined by the City Manager on an annual basis after a public hearing. Criteria for this determination are simplified from the current City Code provisions. To obtain authority for additional cabs, a company must show that, based on valid data, it needs additional vehicles to serve customers with prompt response times, and that the additional cabs will be consistent with a reasonable level of driver income.
- In addition to providing authority for additional cabs, the City Manager may determine to reduce the number of cabs authorized to be operating, based on an analysis of call volumes and after a public hearing.
- Each company must have a minimum of 15 non-airport taxicabs and must provide 24-hour radio dispatch service in the city. The requirement for non-airport cabs replaces the 51% rule.
- The City sets a uniform fare. *(No change from current system.)*
- The Police Department continues to focus its regulatory resources on testing applicants for new taxi driver licenses and vehicle inspections, and T&ES focuses on the issues of the number of certificates and fare levels. *(No change from current system.)*

Comments:

- Requirement for minimum number of non-airport cabs (i.e., cabs that do not have an airport permit and never pick up on-demand airport customers) means that companies must provide meaningful dispatch service within the city – otherwise drivers will not fill the cabs.
- The requirement for non-airport cabs is intended to increase the number of companies with dispatch operations, thus providing customers and drivers with a greater choice of companies to work for. However, a consequence of this requirement could be that some companies merge or possibly go out of business.

- The simplified determination regarding the authorized number of cabs focuses on balancing needs for prompt response times and for maintaining adequate driver incomes. Process uses specific criteria that provide a focused basis for City Manager to make the determination.
- PCN determination is company-specific rather than industry-wide, to encourage companies to market to the dispatch trip market as a means to expand in size.
- No change in process for drivers to transfer between companies.

Model B. Certificate cards issued to drivers

Overview:

This model is based on the AUTO proposal. While a Certificate of Convenience and Necessity is still issued to each cab company, certificate cards are issued to, and held and controlled by, drivers instead of cab companies. Another change is that the ceiling on the number of cabs per company is uniform across companies, and sums to a total that exceeds the number of authorized certificate cards. Objectives of this model are to create a multi-company environment in which companies compete for drivers and to provide drivers with the opportunity to move between companies.

Key features:

- Certificates of Convenience and Necessity are issued to taxi companies for the operation of cab service in the city. *(No change from current system.)*
- The City issues certificate cards to drivers, based on a waiting list. Certificate cards are transferable through the Hack Inspector to qualified buyers at an agreed-upon price.
- Owner-operators must affiliate with a cab company.
- Cab companies must have a minimum of 100 owner-operators at start-up and 50 taxicabs to continue operating.
- Ceiling of 258 cabs per company. Applies to all cab companies.
- Cab companies must provide 24-hour radio dispatch service in the city. *(No change from current system.)*
- The number of taxicabs is determined by the City Manager on an annual basis after a public hearing.
- The City sets a uniform fare. *(No change from current system.)*
- The City of Alexandria Police Department focuses its regulatory resources on testing applicants for new taxi driver licenses and vehicle inspections. T&ES focuses on the issues of the number of certificates and fare levels. Aside from these functions, regulatory requirements and enforcement are relatively minimal. *(No change from current system.)*

Comments:

- Provides independence to drivers who hold a certificate card to move between companies. Only limitations are that the new company accepts the driver and does not exceed the cap of 258 cabs per company.
- Driver movement determines the size of each company up to the 258 cab ceiling. To expand, companies must either attract drivers who hold certificate cards or obtain authority for a higher cap through the City Manager.
- City must set the number of cabs to balance demand for service and industry financial health.

Model C. Permit system with open-movement transition period

Overview:

This model begins with a transition period in which special rules apply, then implements new permanent regulations that strengthens the dispatch service requirements and simplifies the PCN process. The overall objective is to create a competitive multi-company environment that is focused on serving dispatch trips and that allows drivers to readily move between companies and companies to expand provided they expand their customer base.

Key features:

- Certificates of Convenience and Necessity are issued to taxi companies for the operation of cab service in the city. *(No change from current system.)*
- Certificate cards are replaced by taxicab permits. Taxicab permits are issued to the vehicle owner (driver or cab company) to use the vehicle as a taxicab in Alexandria.
- Drivers who have taxicab permits must affiliate with a cab company.
- The number of taxicabs is determined by the City Manager on an annual basis after a public hearing. Criteria for this determination are simplified from the current City Code provisions. To obtain authority for additional cabs, a company must show that, based on valid data, it needs additional vehicles to serve customers with prompt response times, and that the additional cabs will be consistent with a reasonable level of driver income.
- Apart from the City Manager annual review process, cab companies are authorized each year to increase or decrease their number of cabs by up to 10%. Companies that reduce their number of cabs by more than 10% can reserve the right to increase back to their original authorized level.
- New companies may enter Alexandria upon showing financial capability, a credible business plan and signing up at least 20 licensed drivers. New companies receive an initial allocation of 35 taxicabs, all of which must be non-airport cabs. Companies can expand beyond 35 cabs in the annual City Manager review process.
- Ceiling on the number of cabs per company of 40% of the authorized number of taxicabs citywide.
- Each company must provide 24-hour radio dispatch service in the city. *(No change from current system.)*
- After a transition period (see below) and possibly an additional grace period, each cab company must have at least 35 non-airport taxicabs and 24-hour dispatch.
- During a 6-12 month transition period the following provisions are in effect:
 - a) Drivers may freely move between companies. Companies that attract a net increase in drivers can increase the number of cabs by that net increase. Thus, if a cab company loses 10 drivers but gains 15 drivers from other companies, the authorized number of cabs for that company increases by 5.

- b) Companies that lose more drivers than they gain may “replace” the cabs upon showing that serving the dispatch business necessitates regaining their previously authorized number of taxicabs. Thus, if a cab company loses 15 drivers and gains only 10 drivers from other companies, the company can recover the 5 net loss by showing company-wide trip volumes necessitate the additional 5 cabs.
- c) Freeze on issuance of new taxi driver licenses during the transition period.

Comments:

- Replacement of certificate cards with taxicab vehicle permits recognizes that vehicles are primarily owned by drivers, not cab companies.
- PCN determination is company-specific rather than industry-wide, to encourage companies to market to the dispatch trip market as a means to expand in size.
- Minimum number of non-airport cabs ensures that companies must have a viable dispatch operation; otherwise, there will be no drivers for the non-airport cabs.
- Transition period allows drivers free movement between companies, while also allowing companies to “replace” drivers who leave upon a showing that their volume of dispatch calls is consistent with the number of cabs the company seeks.
- After the transition period, drivers have flexibility to move between companies to the extent that companies can go up to an additional 10% ceiling and can add cabs further through the annual review.
- While the requirement for non-airport cabs is intended to increase the number of companies with dispatch operations, thus providing customers and drivers with a greater choice of companies to work for, the result could be that some companies merge or possibly go out of business.
- 40% ceiling is intended to foster a competitive multi-company environment in which no company can dominate.
- Post-transition (permanent) annual review of the number of taxicabs focuses on balancing needs for prompt and reliable dispatch response times and adequate driver incomes. The review is company-specific based on filings by each company. Process uses specific criteria that provide a focused basis for City Manager to make the determination.
- 10% flexibility in company size gives companies ability to expand as their market grows and to reduce their number of cabs during a drop in demand.
- Provision for new companies to enter the market helps to foster a competitive multi-company environment.
- Freeze on licensing of new drivers is intended to downsize the industry in light of the current economic situation and to provide incentive for companies to make stand dues attractive to drivers during the transition period.

W.S.

3-23-04**RICH GREENBERG ROSENTHAL & COSTLE, LLP**

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DATE: 19 March 2004

FACSIMILE TRANSMISSION SHEET

Number of pages including cover: 3

Please deliver the following facsimile transmission.

TO: Jacqueline M. Henderson
City Clerk & Clerk of Council

FAX #: 703/838-6433

FROM: Dina Stephenson, Paralegal to Lonnie C. Rich

SUBJECT: Another Proposal for Improving the Taxicab Industry

MESSAGE: Please distribute to the Mayor and Members of Council Please call our office if you have any questions.

If you experience any difficulties with this transmission, please contact the sender at once at (703) 836-7441. Unless otherwise indicated here (), the original documents will follow by mail.

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March 19, 2004

Mayor, Members of Council and City Manager
Room 2300
City Hall
301 King Street
Alexandria, VA 22314

Re: Another Proposal for Improving the Taxicab Industry

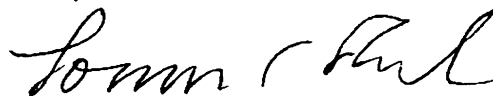
Dear Mayor, Members of Council and City Manager:

Almost a year ago, we proposed solutions that could have improved the Alexandria taxi industry by reducing the number of certificates and creating a two-tier system. Since then, we have proposed creating a pool of certificates that could be used by a driver cooperative; and we proposed voluntarily giving up some of Diamond Cab's certificates for that purposes.

In an effort to find a way out of the logjam between both companies and drivers wanting full control of the certificates, we are offering for your consideration another proposal, which is based in part on the Consultant's Model C. In short, the enclosed proposal permits unlimited driver movement and yet preserves the ability of dispatch companies to backfill their certificates as long as they have the call-volume to support.

If you have any questions, please contact me. We look forward to participating in the work session next week.

Sincerely,



Lonnie C. Rich

Enclosure

c: Jim Yates, Alexandria Yellow Cab. Inc.

Proposal Based on Consultant's Model C

Basically, Model C has companies controlling the Certificate of Convenience and driver-operators controlling the certificate cards, renamed as "permits." Under this system, open movement by drivers is permitted during a transition period, and thereafter drivers can move with their permits to another company so long as that company does not exceed some percent of its authorized number of certificates.

Model C permits substantial movement, but can be improved to permit greater movement for drivers. With some changes, Model C could be made to work for the City, the drivers and the cab companies.

First, there should not be a transition period. Drivers, who control their own permit, should be permitted to move at any time. Drivers can move to any company who will accept them, or drivers can become "independent" drivers with black and white cabs, and simply pay an annual fee to the City. These independent drivers may work the airport or the City stands.

The administrative difference between dispatch companies and airport companies is that for dispatch companies there would be a requirement for maintaining "call-volume" records and drivers for dispatch companies would be required to maintain a proper manifest. Airport companies could continue to exist without these administrative burdens.

The significant difference between dispatch companies and airport companies would relate to backfilling positions. If a driver moves away from an airport company, the airport company could only backfill their certificate slot with another driver who has a permit. If a driver moves from a dispatch company, the company can backfill their certificate slot with a driver from another company or engage a "new" driver. However, the right of a dispatch company to backfill would be dependent upon being able to demonstrate that its "call-volume" justifies the backfilling regardless of source.

There will need to be a reasonable definition of call-volume, a reasonable basis for collecting and verifying data provided by companies and drivers, and reasonable intervals or time periods for reviewing data to determine if dispatch companies are diluting driver opportunity by having too many drivers and not enough call-volume. The call-volume data must be reasonably verifiable from company records and cross-checked against driver manifests. The failure either of companies to keep mandatory call-volume records or of drivers to maintain proper manifests must have consequences. To avoid dilution of driver income, there should be a limit on the number of independent "permits." There may also need to be an overall limit on the number of certificates.

Finally, there should be a limit on the size of any one dispatch company. However, rather than a 40% limit, the limit should be greater. As a practical matter, a City the size of Alexandria can only handle two, maybe three full-service dispatch companies. If there are only two, then the maximum for both cannot be 40%. Drivers with control of their permits will want to move to the company providing the best service.

W. S.

3-23-04

BEACH & ASSOCIATES

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March 19, 2004

The Honorable William D. Euille, Mayor
Members of City Council
City Hall
301 King Street
Alexandria, VA 22314

Re: Work Session - Taxicabs

Dear Mayor Euille and Members of City Council:

I represent the White Top Cab Company and am writing to provide our input on the materials before you for the March 23rd work session. We believe that Model A offers the most benefits to the City and its residents because it insures a reliable stable manner of providing taxicab services.

It seems like we have all revisited this issue numerous times. My first exposure was in 1982 as a member of the city attorney's office. The City Council at that time elected to return to what is referred to as the "current system" where the companies hold the certificates. That decision was driven by several factors but the one that remains strong in my mind was the overwhelming drain on city staff resources from regulating the individual driver permit system. The frequent disputes among the drivers as to who owned the permits required staff and legal decisions continuously. Allegations of theft, incompetence, fraud, etc. led to some interesting staff interventions and requests for legal interpretations. The transfer back of the permits to the companies removed the City from these disputes and placed the individual cab regulatory onus on the companies and I believe the companies have done a commendable job in monitoring the drivers and their suitability for providing taxicab services to our community. Furthermore, with the loss of some sources of state and federal funding to the City I am assuming that the City is looking at ways to reduce or limit the impact on staff resources and the current system accomplishes this goal.

Many of you remember my client – White Top Cab – when it was a much smaller business without the 24-hour dispatch capability. Since the 1982 decision to return the certificates to the companies, our business has grown. We now have 116 cabs and a weekly payroll of approximately \$5,000.00. We also spend more than \$1,000.00 a week advertising. We collect approximately \$7,800.00 from stand fees weekly. After the

\$6,000.00 in payroll and advertising, we have less than \$2,000.00 to pay insurance, rent, phone service, taxes, etc.

The taxicab drivers average \$15.00 a fare. For our drivers that means that their first 8 fares cover their stand fees. The sum of their earnings is driven by how much they work because they pocket the remainder of their earnings. In exchange for the stand fees, the driver gets the benefit of dispatch and advertising services. The consideration of how the certificate system operates is not an issue of economic parity.

What strikes terror in the companies hearts is that by shifting the permit to the driver you create an environment where a strike would leave the companies and the citizens at risk. We would be unable to get drivers elsewhere because they would not have the required permits.

For all of these reasons, we ask that you maintain the current system. Change does not offer benefits to the companies, to the over worked city staff and to the citizens. The current system is stable and reliable – please allow it to continue.

I am available, as always for any question or comments you may have. Thank you for your time.

With kind personal regards, I remain

Very truly yours,


Barbara P. Beach

cc: Ken Aggrey